

CIGNA Property and Casualty Companies

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Suite 850  
Chicago, IL 60631

P.O. Box 8154  
Park Ridge, IL 60068-8154

US EPA RECORDS CENTER REGION 5



407679



April 29, 1988

The Freedom of Information Officer  
Environmental Protection Agency  
Region 5  
230 S. Dearborn  
Chicago, Illinois 60604

RECEIVED

MAY 06 1988

Re: FREEDOM OF INFORMATION ACT REQUEST  
Insured: Montgomery Ward (Standard T)  
Claimant: USEPA  
Sites: Steve Martell Sites  
U.S. Scrap, Chicago, Illinois  
Penn Central, Chicago, Illinois  
Paxton, Chicago, Illinois  
Our File No: 717L753656-2  
717L753657-3  
717L753659-5

OFFICE OF  
PUBLIC AFFAIRS  
*due date 5-20*  
*RIN 1241-88*  
*S*

Dear Sir:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. No. 552, we are writing to request copies of all documents concerning Montgomery Ward's (Standard T) involvement in the above referenced site. Specifically, we request copies of the following:

1. Any and all information request letters relating to these sites sent to our insured by the EPA pursuant to Section 104 of the Comprehensive Environmental Response, No. 9604 and/or Section 3007 of the Resource Conservation and Recovery Act, 42 U.S.C. No. 6927;
2. Any and all documents submitted to the EPA by our insured in response to the information request letters identified in item 1, above;
3. All correspondence from the EPA to our insured including, without limitation, notice letters informing the PRPs of the potential liability for clean-up and/or informing the PRPs of the opportunity

to conduct or participate in the development of the Remedial Investigation and Feasibility Study ("RI/FS");

4. A list of all PRPs identified in connection with this site;
5. All documents relating to the type of volume of hazardous substances and/or hazardous wastes involved which related to our insured's products;
6. All documents relating to any Administrative Orders issued or Consent Decrees agreed upon;
7. All documents reflecting, relating or referring to negotiations and/or agreements with our insured;
8. All documents reflecting, relating or referring to the estimated or actual cost of any removal and/or remedial action taken or planned;
9. All documents relating to the insurance coverage of our insured;
10. Any and all RI/FS pertaining to the site;
11. Any and all ROD pertaining to the site;
12. Any and all EPA news releases pertaining to the site.

For purposes of this request, the term "document" includes, without limitation, all correspondence, memoranda, inter-intra agency communications, minutes, reports, notes, schedules, analyses, photographs, contracts, proposals, and all other such documents tangible or retrievable of any kind.

As provided under the FOIA, we expect to receive a reply to this request within ten (10) working days. In the event that a determination is made that some or all of the documents requested are exempt from disclosure under the FOIA,

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please identify those documents withheld and the basis for the Agency's exemption in each instance. Finally, please provide us with a copy of all non-exempt material to the extent that it is reasonably segregable from material claimed by the Agency to be exempt from disclosure.

To expedite this request, please bill or notify the undersigned as soon as possible regarding the cost of duplicating these documents. Should you need additional information in order to process this request, please do not hesitate to contact me at 380-8387. Also, please use our file number on all correspondence. Thank you in advance for your assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Vicki A. Strauss".

Vicki A. Strauss  
Regional Environmental Representative

VAS/lg-245

cc: Wayne Gonyer

cc: Ray Rizzi

FROM  CIGNA			CONTROL NO.  RIN 1241-88
SUBJECT AND DATE  FREEDOM OF INFORMATION  <i>Kowalski</i>			DATE REC'D  5-6-88
			DUE DATE  5-20-88
REFERRED (1)  SUPERFUND	(2)  <i>Clam</i>	(3)	(4)
DATE 5-6-88			
REPLY SENT TO  If fee is charged, copy to FID			DATE RELEASED
REMARKS  Signature: Division Director or Branch Chief DD or RA (Denial) ORC Concurrence Required  Copy to: Public Affairs			ACKNOWLEDGED - DATE  <input type="checkbox"/>
			NO ANSWER NEEDED
			<input type="checkbox"/> (Explain in remarks)

EPA Form 5180-1 (6-72)  
REPLACES FWPCA FORM 72 AND  
HEW-73 WHICH MAY NOT BE USED.

(Remove this copy only, do not separate remainder.)

MAIL CONTROL SCHEDULE